

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY <b>Caption in Compliance with D.N.J. LBR 9004-2(c)</b>  Robert Manchel, Esquire 1 Eves Drive, Suite 111 Marlton, NJ 08053-3125 Attorney for Debtor RM-1141	In Re:  Shaun J. Reiss	Case No. 18-25819MBK  Judge: Michael B. Kaplan  Chapter 13
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**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

**X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

**TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (**choose one**):

1.  Motion for Relief from the Automatic Stay filed by \_\_\_\_\_, creditor. A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_ a.m.

OR

Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for \_\_\_\_\_ at \_\_\_\_\_ a.m.

OR

Certification of Default filed by PNC Bank, NA, creditor. I am requesting that a hearing be scheduled on this matter.

OR

Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

OR

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

Other: I will make an immediate payment of \$19,427.59 as well as file a modified plan to include the arrears of \$9,753.08 as stated in the previous order. Additionally, I will resume regular payments as of December 2019. I respectfully request the court deny the movant's motion and allow me to continue and complete my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 11/17/2019

/s/ Shaun J. Reiss  
Shaun J. Reiss, Debtor